

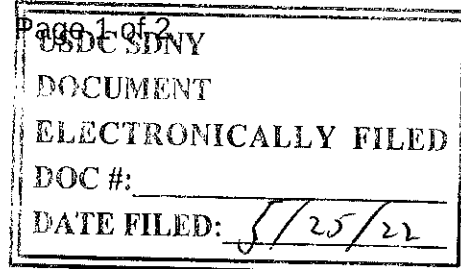
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MEMO ENDORSED

May 24, 2022

Via ECF

Honorable Lewis A. Kaplan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED

Graceted
L. Kaplan
LEWIS A. KAPLAN, USDJ
5/25/22

Re: *Cervecería Modelo de México, S. de R.L. de C.V., et al., v. CB Brand Strategies, LLC, et al., Case No. 1:21 Civ. 01317-LAK (S.D.N.Y.)*

Dear Judge Kaplan,

Pursuant to Sections 5, 6, and 9.4 of the Stipulated Protective Order and Confidentiality Agreement (ECF No. 47 ("Protective Order")) and Your Honor's Individual Rules of Practice, Defendants CB Brand Strategies, LLC, Crown Imports LLC, and Compañía Cervecera de Coahuila, S. de R.L. de C.V. (collectively, the "Defendants") respectfully seek leave to file under seal the Memorandum Of Law In Opposition To Plaintiffs' Motion Challenging Defendants' Privilege Designation For Previously Produced Documents (the "Opposition Brief"), along with the exhibits appended thereto. Section 9.4 of the Protective Order provides that filings in connection with challenges to privilege assertions are to be filed under seal, and certain of the exhibits have been designated as "Highly Confidential" pursuant to the Protective Order.

We respectfully ask that the Court grant Defendants' request for leave to file the Opposition Brief and related materials under seal.¹

¹ Defendants also presume and wish to confirm that the documents filed by Plaintiffs (ECF Nos. 144-145), which contain privileged, highly confidential materials belonging to Defendants, will remain under seal despite Plaintiffs' failure to file a similar letter motion pursuant to Your Honor's Individual Rules of Practice.

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The Honorable Lewis A. Kaplan
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Respectfully submitted,

/s/ Sandra C. Goldstein

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